REMARKS

Claims 1-118 were pending and presented for examination and in this application. In an Office Action dated August 21, 2006, claims 1-118 were rejected. Applicants thank Examiner for examination of the claims pending in this application and addresses Examiner's comments below.

Applicants are amending claims 1 and 81 in this Amendment and Response. These changes are believed not to introduce new matter, and their entry is respectfully requested. In making these amendments, Applicants do not concede that the subject matter of such claims was in fact disclosed or taught by the cited prior art. Rather, Applicants reserve the right to pursue such protection at a later point in time and merely seeks to pursue protection for the subject matter presented in this submission.

In view of the Amendments herein and the Remarks that follow, Applicants respectfully request that Examiner reconsider all outstanding rejections, and withdraw them.

Response to Rejections under 35 U.S.C. 103

In the 22nd paragraph of the Office Action, claims 81-84, 98-99, and 118 have been rejected under U.S.C. 103(a) as allegedly being unpatentable over U.S. Patent No. 5,721,883 to Katsuo ("Katsuo") in view of U.S. Patent No. 6,476,793 B1 to Motoyama ("Motoyama"). This rejection is now traversed.

Claim 81, as amended, recites a method for printing time-based media, the method comprising:

> receiving time-based media data from a media source;
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> receiving user input, the user input specifying a multimedia function to perform on the time-based media, an amount of processing to be performed by a printer, and an amount of processing to be performed by a processing device;

determining from the user input a portion of the processing to be allocated to the printer and a portion of the processing to be allocated to the processing device;

allocating the determined processing portions to the printer and the processing device **based on the user input**;

performing, by the printer, the allocated portion of processing to carry out the specified multimedia function;

performing, by the processing device, the allocated portion of processing to carry out the specified multimedia function;

producing output on the printer associated with the processed media data; and

producing an electronic output associated with the processed media data.

The claimed invention performs, by a printer and a processing device, processing on time-based media to carry out a specified multimedia function. A user input is received to specify the multimedia function to be performed as well as how much processing is to be performed by the printer and how much processing is to be performed by the other processing device based on the user input. An output associated with the processed media data is produced on the printer and an electronic output is produced. As disclosed in the specification, examples of multimedia functions performed on time-based media may include, without limitation, event detection, sound localization, speech recognition, and face detection.

The Examiner's rejection is based on two disparate references that are improperly combined. Further, the references do not disclose all of the claimed elements. Thus, the rejection should be withdrawn.

Katsuo discloses a parallel processing system for parallel image processing. Multiple processors operate on a portion of the data to produce multiple partial image processing results and the partial results are integrated to form a final result. See, for example, Katsuo, Abstract. As the Examiner admits, Katsuo does not disclose the claimed elements that said media data is specifically time-based media data; that said

input is a user input; that said first processing device is a printer; and producing output on the printer associated with the processed media data.

Motoyama discloses a video processing method and apparatus for color conversion and color adjustment. Motoyama addresses a problem in the prior art in which video color correction causes loss of gradation, and additionally provides an improved way of specifying a particular area to be subjected to color adjustment. See, for example, Motoyama col. 1, lines 30-43.

There is no teaching or suggestion in Katsuo or Motoyama to combine the references. For example, Katsuo does not mention or even suggest a printer or processing of time-based media. Motoyama does not mention or even suggest using more than one processing device to share the processing workload or the use of any parallel processing device. Thus, it would not have been obvious to combine the parallel processing system of Katsuo with the system of Motoyama because there is no incentive, motivation, or suggestion for making the combination in the references.

Applicants further note that in previously submitted "Amendment B", claim 81 had been amended to include the steps of

> …determining from the user input a portion of the processing to be allocated to the printer and a portion of the processing to be allocated to the processing device;
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> allocating the determined processing portions to the printer and the processing device…

In the 2nd paragraph of the Office Action, the Examiner agreed that the amendment overcame the previously cited combination of Jacobs, Motoyama, and Gopal. Jacobs and Gopal are examples of conventional parallel processing systems: Jacobs discloses using multiple processors in parallel to perform rasterizing operations, and Gopal discloses using a load balancing technique in a parallel processing environment.

In the present rejection, the Examiner merely replaced Jacobs and Gopal with Katsuo, a parallel processing system for image processing.

However, the disclosure of Katsuo is no more relevant than the previously cited references which the Examiner agreed were overcome by the amendment. For example, the Examiner admits that Katsuo does not disclose a user input. Katsuo further does not disclose determining **from a user input** a portion of processing to be allocated **to a printer** and a portion of processing to be allocated to a processing device. Katsuo further does not disclose allocating the determined processing portions to the printer and the processing device **based on the user input.** Thus, the claim, as amended, is also patentably distinguishable over Katsuo and Motoyama for at least the same reasons that it is patentably distinguishable over Jacobs, Motoyama, and Gopel.

The Examiner recites that the claimed feature would be obvious because it would be easier and more convenient to be able to simply input what the first and second processing amounts are, rather than waiting for the parallel processing system to perform a set of configuration determinations. However, the claimed invention would not be obvious because Katsuo teaches away from the claimed invention. The goal of Katsuo is to provide a system such that a computer automatically determines the processing amounts to be performed by each processor. Thus, Katsuo teaches that it is easier and more convenient for a computer, rather than a user, to determine the workload distribution. For example, in col. 13 lines 47-53, Katsuo recites "the program developer can describe (write) program without being conscious of sharing of role to respective processors. As a result, the development time of program can be shortened. Thus, burden on the program developer can be lessened."

Thus, Katsuo is concerned with providing maximum processing efficiency and discloses a computer-determined distribution of the workload to the processors in order to

process data more quickly. In contrast, the claimed invention allows a user input to determine the workload distribution. This provides additional flexibility to the user, and allows the user to make selections that are not necessarily maximally efficient, if the user desires. Therefore, the teachings of Katsuo are inconsistent with the claimed invention and would lead one of ordinary skill in a direction divergent from the claimed invention.

For at least the reasons above, claim 81 is patentably distinguishable over Katsuo and Motoyama. Therefore, Applicants respectfully request that the Examiner reconsider the rejection and withdraw it. Claims 82-84, 98-99 and 118 depend from claim 81 and the rejections to those claims should also be withdrawn for at least the same reasons as above.

In the 4th paragraph of the Office Action, claims 1-6, 20-21, 40, and 55 have been rejected under U.S.C. 103(a) as allegedly being unpatentable over Katsuo, Motoyama, and "Performance Analysis of Median Filtering on Meiko™ – A Distributed Multiprocessor System", by K.M. Poon and N.H.C. Yung ("Poon"). This rejection is traversed.

Claim 1 recites a system for printing time-based media data including elements similar to those discussed above. In particular, claim 1 recites:

> …a user interface for receiving user input, **the user input specifying a multimedia function to perform on the time-based media and including a first amount of processing to be performed by a printer and a second amount of processing to be performed by a processing device**;
>
> a printer, communicatively coupled to the user interface, adapted to perform the first amount of processing indicated by the received **user input**, and to instruct a processing device to perform the second amount of processing indicated by the received **user input**, in order to perform the specified multimedia function on the time-based media; and
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> a processing device, adapted to perform the second amount of processing in response to instruction from the printer.

The Examiner again relies on the improper combination of Katsuo and Motoyama discussed previously, and further combines the references with Poon.

The claimed invention is not obvious in view of Katsuo, Motoyama, and Poon. Poon discloses a multiprocessing filtering system with a master-slave configuration. A master processor reads and writes image data and dispatches sub-images to the slave processors. See, for example, Poon p. 635 lines 1-10.

As discussed above, the rejection in view of Katsuo and Motoyama is improper and should be withdrawn. The additional disclosure of Poon does not provide any further support of the Examiner's rejection because Poon also does not reveal any teaching or suggestion to combine the references. For example, like Katsuo, Poon does not mention or even suggest a printer or any type of printing system. Poon further does not mention or even suggest processing time-based media. Poon further does not mention or suggest a user input or interface that enables a user to select an amount of processing to be performed by the printer and an amount of processing to be performed by the processing device. Rather, Poon teaches away from the claimed invention because Poon discloses that the amount of processing should be computer-determined (using Eq. 6) and equally distributed between processors in order to maximize efficiency (see, for example, p. 635 col 1. lines 1-30).

Therefore, for at least the reasons above, claim 1 is patentably distinguishable over Katsuo, Motoyama and Poon. Applicants respectfully request that the Examiner reconsider the rejection and withdraw it. Claims 2-6, 20-21, 40, 45, and 55 depend from claim 1. Therefore, the rejections to these claims should also be withdrawn for at least the same reasons as above.

In the 5th-33rd paragraphs of the Office Action, the remaining dependent claims have further been rejected under U.S.C. 103(a) as allegedly being unpatentable over Katsuo and Motoyama in various combinations with Poon, U.S. Patent No. 6,118,888 to

Chino; U.S. Patent No. 5,091,948 to Kametani; U.S. Patent Application Publication No. 2002/0101513 A1 to Halverson; U.S. Patent No. 6,661,622 B1 to Krum; U.S. patent No. 6,594,377 B1 to Kim; U.S. Patent No. 5,568,406 to Gerber; U.S. Patent Application Publication No. 2003/0220988 A1 to Hymel; U.S. Patent Application Publication no. 2002/0010641 A1 to Stevens; U.S. Patent No. 6,296,693 B1 to McCarthy; U.S. Patent No. 5,115,967 to Wedekind; U.S. Patent Application Publication No. 2001/0003846 A1 to Rowe; and U.S. Patent No. 6,373,498 B1 to Abgrall.

Katsuo and Motoyama are improperly combined as discussed above and the additional cited references all fail to provide any further suggestion of the combination. Therefore, the various combinations of references cited in paragraphs 5-33 of the Office Action are also improper for at least the same reasons as above. The cited references further fail to disclose or suggest all of the claimed elements previously discussed. For example, none of the above cited references disclose or suggest receiving a user input that enables a user to specify a first amount of processing to be performed by a printer and a second amount of processing to be performed by the other processing device. Further, the dependent claims recite additional elements that are also patentably distinguishable from all cited combinations of the above references. Therefore, Applicants respectfully request that the Examiner reconsider the rejections to the remaining dependent claims and withdraw them.

CONCLUSION

The Examiner is asked to issue a Notice of Allowance for all pending claims. If any matters remain outstanding prior to allowance of the claims, the Examiner is invited to contact the undersigned attorney. Applicants acknowledge that a copy of any electronic mail communications will be made of record in the application file per MPEP § 502.03.

Respectfully submitted,
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